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Our File No.

38110-100

October 25, 2021

By ECF and Email

Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Kleeberg, et al. v. Eber, et al.*  
*Docket No. 16-cv-9517 (LAK)***

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***Plaintiffs' October 22, 2021 Letter Application Requesting Additional Time to  
Address Subject Matter Jurisdiction***

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Dear Judge Kaplan:

We are in receipt of Plaintiffs' letter application, dated October 22, requesting additional time to respond to Defendants' Proposed Findings of Fact and Conclusions of Law insofar as it calls for dismissal for lack of subject matter jurisdiction under the *Princess Lida* Doctrine.

Plaintiffs, by requesting 14 days (until November 5) to address the *Princess Lida* Doctrine's application to this case, are, in sum and substance, requesting that this issue be briefed and presented to the Court in the same manner as a motion under Local Rule 6.1. Defendants consent to Plaintiffs' request on condition that Defendants be permitted 7 days for reply papers (until November 12).

Plaintiffs' letter application presents a preview of their arguments concerning the *Princess Lida* Doctrine that is more appropriately presented in briefing rather than a letter application for an extension of time. Defendants respectfully submit that they be permitted to address any such arguments in a reply brief.

Respectfully submitted,

A handwritten signature in black ink, consisting of a stylized 'F' followed by a horizontal line and a small loop at the end.

Frank T. Santoro

cc: Counsel of Record